

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

Donald J. Trump, Candidate for President
of the United States of America,

Plaintiff,

vs.

Case No. 2:-20-cv-01785-BHL

The Wisconsin Elections Commission, and its
members, Ann S. Jacobs, Mark L. Thomsen,
Marge Bostelman, Dean Knudson, Robert F.
Spindell, Jr., in their official capacities, Scott
McDonell in his official capacity as the Dane
County Clerk, George L. Christenson in his
official capacity as the Milwaukee County
Clerk, Julietta Henry in her official capacity as
the Milwaukee Election Director, Claire
Woodall-Vogg in her official capacity as the
Executive Director of the Milwaukee Election
Commission, Mayor Tom Barrett, Jim
Owczarski, Mayor Satya Rhodes-Conway,
Maribeth Witzel-Behl, Mayor Cory Mason, Tara
Coolidge, Mayor John Antaramian, Matt
Krauter, Mayor Eric Genrich, Kris Teske, in
their official Capacities; Douglas J. La Follette,
Wisconsin Secretary of State, in his official
capacity, and Tony Evers, Governor of
Wisconsin, in his Official capacity.

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE ONE
CONSOLIDATED OVERSIZED RESPONSE MEMORANDUM OF UP TO
FIFTY-SIX (56) PAGES IN LENGTH**

Plaintiff Donald J. Trump, by counsel, moves the Court for leave to file one
(1) oversized Response memorandum of not more than fifty-six (56) pages, and in
support, states as follows:

1. On March 31, 2021, Governor Tony Evers filed his motion and brief in support of his Petition for attorneys' fees and sanctions (Dkt. Nos. 144 and 145).

Governor Evers' brief in support totals 30 pages.

2. On April 2, 2021, Cory Mason, Tara Coolidge, John Antaramian, Matt Krauter, Eric Genrich, and Kris Teske (the "Green Bay, Kenosha and Racine Defendants") filed their motion and brief in support of their motion for an award of fees (Dkt Nos. 152 and 153). The Green Bay, Kenosha and Racine Defendants' brief in support totals 17 pages.

3. On April 8, 2021, George L. Christenson and Julietta Henry (the "Milwaukee County Defendants") filed their motion and memorandum of law in support of their motion for attorney fees (Dkt Nos. 155 and 156). The Milwaukee County Defendants' memorandum in support totals 9 pages.

4. The response of the Plaintiff and his counsel to the motions and briefs in support of the three foregoing motions for attorney fees is currently due on July 12, 2021, and said time has not expired.

5. Given that the Green Bay, Kenosha and Racine Defendants, and the Milwaukee County Defendants incorporated aspects of Governor Evers' arguments into their briefs and in order to streamline and simplify the pleadings before the Court, Plaintiff proposes to file a single, consolidated response memorandum in opposition to the three pending motions and briefs filed seeking attorney fees in this matter. The three briefs which Plaintiff proposes to address in a single consolidated

response total 56 pages. Accordingly, Plaintiff is requesting the opportunity to file a single, consolidated response brief totaling no more than 56 pages.

6. Pursuant to Civil L.R. 7(f), a memorandum in opposition may not exceed 30 pages unless the Court has previously granted leave to file an oversized memorandum.

7. In order for Plaintiff to file a single, consolidated memorandum in response to all three attorneys fees motions filed by Governor Evers, the Green Bay, Kenosha and Racine Defendants, and the Milwaukee County Defendants, Plaintiff respectfully requests leave of court to file a single consolidated oversized memorandum in opposition totaling no more than 56 pages.

8. Counsel for Plaintiff has conferred with counsel for Governor Evers, the Green Bay, Kenosha and Racine Defendants, and the Milwaukee County Defendants and is authorized to represent that there is no objection to Plaintiff's request to file an oversized memorandum in opposition totaling no more than 56 pages.

WHEREFORE, Plaintiff, by counsel, respectfully moves the Court for an order authorizing Plaintiff to file a single, consolidated, oversized memorandum in opposition to the pending attorney fees motions of Governor Evers, the Green Bay, Kenosha and Racine Defendants, and the Milwaukee County Defendants, and totaling no more than 56 pages, and for all other just and proper relief.

Respectfully Submitted,

KROGER, GARDIS & REGAS, LLP

/s/ William Bock, III

William Bock III, Indiana Attorney No. 14777-49

James A. Knauer, Indiana Attorney No. 5436-49

Kevin D. Koons, Indiana Attorney No. 27915-49

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CERTIFICATE OF SERVICE

A copy of the foregoing document was served upon all parties' counsel of record via this Court's CM/ECF service on this 2nd day of July, 2021.

/s/ William Bock, III